



To Whom It May Concern:

I write to provide comments on behalf of the Vermont Public Interest Research Group and our members and supporters statewide regarding the Proposed Rule Governing Outage Reporting Requirements for Originating Carriers and Electric Power Companies.

VPIRG is broadly supportive of the rule as drafted – and feels that it incorporates reporting thresholds that are generally more appropriate for Vermont than federal reporting thresholds and therefore appropriate for advancing public safety in our state.

Regarding specific changes – VPIRG would encourage the Board to consider editing section 4.2 so that the reporting thresholds for other facilities-based fixed voice service match the thresholds for ILEC voice services referenced in section 4.1. Act 125 only requires that the Board to adopt standards in line with California as it pertains to wireless service providers. As such, we believe the Board would be well advised to apply a reporting threshold for facilities-based fixed voice service that mirrors the threshold for other traditional landline communications.

We would also echo the feedback you've heard from other individual Vermonters that Section 6 – the section pertaining to confidentiality – remain as drafted. We believe the current language ensures maximum consumer transparency, while allowing for the protection of any information that is truly sensitive.

Thank you for the opportunity to comment and the Board's work on this rule.

Sincerely,

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